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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO APPLICATIONS FOR
INTERIM COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
BY APPLICANTS FROM APRIL 1, 2020 THROUGH JULY 31, 2020**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his

undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On November 6, 2020, the Trustee filed the Applications for Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred by Applicants from April 1, 2020 through July 31, 2020 (the "Fee Applications"). These Fee Applications include the following:

- A. Thirty-Fourth Application of Trustee and Baker & Hostetler LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2020 through July 31, 2020 for Baker & Hostetler, L.L.P., Trustee's Attorney, period: 4/1/2020 to 7/31/2020, fee:\$34,565,689.35, expenses: \$159,987.74 filed by Baker & Hostetler, L.L.P (Filed: 11/6/2020) [ECF No. 19918]
- B. Thirty-Third Application of Windels Marx Lane & Mittendorf, LLP for Allowance Of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2020 through July 31, 2020 for Windels Marx Lane & Mittendorf, LLP, Special Counsel, period: 4/1/2020 to 7/31/2020, fee: \$2,105,420.50, expenses: \$5,951.93 filed by Windels Marx Lane & Mittendorf, LLP (Filed: 11/6/2020) [ECF No. 19919]
- C. Application of Browne Jacobson, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2020 through July 31, 2020 for Browne Jacobson, LLP, Special Counsel, period: 4/1/2020 to 7/31/2020, fee:\$97,155.88, expenses: \$1,763.84 filed by Browne Jacobson, LLP (Filed: 11/6/2020) [ECF No. 19920]
- D. Twenty-Ninth Application of Young Conaway Stargatt & Taylor, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2020 through July 31, 2020 for Young Conaway Stargatt & Taylor, LLP, Special Counsel, period: 4/1/2020 to 7/31/2020, fee:\$94,509.81, expenses: \$236.97 filed by Young Conaway Stargatt & Taylor, LLP (Filed: 11/6/2020) [ECF No. 19921]
- E. Application of Schiltz & Schiltz as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2020 through July 31, 2020 for Schiltz & Schiltz, Special Counsel, period: 4/1/2020 to 7/31/2020,

fee:\$59,066.80, expenses: \$3,839.34 filed by Schiltz & Schiltz (Filed: 11/6/2020) [ECF No. 19922]

- F. Application of Graf & Pitkowitz Rechtsnwalte GMBH as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2020 through July 31, 2020 for Graf & Pitkowitz Rechtsnwalte GMBH, Special Counsel, period: 4/1/2020 to 7/31/2020, fee:\$75,961.70, expenses: \$4,006.53 filed by Graf & Pitkowitz Rechtsnwalte GMBH (Filed: 11/6/2020) [ECF No. 19923]
- G. Ninth Application of The Scaletta Law Firm, PLLC as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2020 through July 31, 2020 for The Scaletta Law Firm, PLLC, Special Counsel, period: 4/1/2020 to 7/31/2020, fee:\$30,901.50, expenses: \$0.00 filed by The Scaletta Law Firm, PLLC (Filed: 11/6/2020) [ECF No. 19924]
- H. Ninth Application of Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2020 through July 31, 2020 for Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP, Special Counsel, period: 4/1/2020 to 7/31/2020, fee:\$213,590.70, expenses: \$993.81 filed by Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP (Filed: 11/6/2020) [ECF No. 19926]
- I. Application of Soroker Agmon Nordman as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2020 through July 31, 2020 for Soroker Agmon Nordman, Special Counsel, period: 4/1/2020 to 7/31/2020, fee: \$841,664.48, expenses: \$43,810.26 filed by Soroker Agmon Nordman (Filed: 11/6/2020) [ECF No. 19927]
- J. Application of Werder Vigano as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2020 through July 31, 2020 for Werder Vigano, Special Counsel, period: 4/1/2020 to 7/31/2020, fee: \$233.90, expenses: \$0.00 filed by Werder Vigano (Filed: 11/6/2020) [ECF No. 19928]
- K. Application of Eugene F. Collins as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2020 through July 31, 2020 for Eugene F. Collins, Special Counsel, period: 4/1/2020 to 7/31/2020, fee: \$10,327.70, expenses: \$0.00 filed by Eugene F. Collins (Filed: 11/6/2020) [ECF No. 19929]
- L. Application of UGGC & Associés as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2020 through July 31, 2020 for UGGC & Associés, Special Counsel, period: 4/1/2020

to 7/31/2020, fee: \$36,160.44, expenses: \$0.00 filed by UGGC & Associés (Filed: 11/6/2020) [ECF No. 19930]

- M. Thirteenth Application of Kelley, Wolter & Scott, Professional Association as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from March 1, 2020 through July 31, 2020 for Kelley, Wolter & Scott, Professional Association, Special Counsel, period: 3/1/2020 to 7/31/2020, fee:\$2,050.00, expenses: \$0.00 filed by Kelley, Wolter & Scott, Professional Association (Filed: 11/6/2020) [ECF No. 19931]
- N. Application of SCA Ontier as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2020 through July 31, 2020 for SCA Ontier, Special Counsel, period: 4/1/2020 to 7/31/2020, fee: \$20,472.30, expenses: \$685.00 filed by SCA Ontier (Filed: 11/6/2020) [ECF No. 19932]
- O. Application of Monfrini Bitton Klein as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2020 through July 31, 2020 for Monfrini Bitton Klein, Special Counsel, period: 4/1/2020 to 7/31/2020, fee: \$46,739.03, expenses: \$54.51 filed by Monfrini Bitton Klein (Filed: 11/6/2020) [ECF No. 19933]

2. The deadline for filing objections to the Fee Applications expired on December 9, 2020 at 4:00 p.m. A hearing on the Fee Applications has been scheduled for December 16, 2020 at 10:00 a.m.

3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-1789 (SMB), ECF No. 4560) (the "Notice Order"), notice of hearing on the Fee Applications was provided by U.S. Mail postage prepaid or email to: (i) all parties included in the Master Service List as defined in the Notice Order; (ii) all parties that filed a notice of appearance in this case; (iii) the SEC; (iv) the IRS; (v) the Acting United States Attorney for the Southern District of New York; and (vi) SIPC.

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or

request for a hearing with respect to the Fee Applications appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Fee Applications.

5. An electronic copy of the proposed order (the “Order”), that is substantially in the form of the proposed order that was annexed to the Fee Applications will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: December 14, 2020
New York, New York

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the Chapter 7 Estate of Bernard L. Madoff*